UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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MAY 03 2010

Michael T. Lesar, Chief
Rulemaking and Directives Branch
Division of Administrative Services
Office of Administration TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Lesar:

RE: NRC Docket ID: NRC-2008-0617, Review of the Generic Environmental Impact Statement for License Renewal of Nuclear Plants, NUREG-1437, Supplement 41, Regarding Cooper Nuclear Station, Unit 1, Draft Report for Comment

The U.S. Environmental Protection Agency (EPA) has reviewed the Nuclear Regulatory Commission's (NRC) Generic Environmental Impact Statement (GEIS), Supplement 41, for the Cooper Nuclear Station, Unit 1 (Draft Report). Our review is provided pursuant to the National Environmental Policy Act (NEPA) 42 U.S.C. 4231, Council on Environmental Quality (CEQ) regulations 40 C.F.R. Parts 1500-1508, and Section 309 of the Clean Air Act (CAA). The GEIS, Supplement 41, was assigned the Council on Environmental Quality (CEQ) number 20100053.

The NRC is proposing to renew the license of the Cooper Nuclear Station (CNS) for an additional 20 years beyond the expiration date of the facility's current 40-year license which is January 18, 2014. CNS is owned and operated by Nebraska Public Power District (NPPD). The facility is located in Nemaha County, Nebraska, on the west bank of the Missouri River at River Mile 532.5, approximately 60 miles southeast of the city of Lincoln. The 1,359 acre site includes 239 acres on the opposite bank of the Missouri River in Atchison County, Missouri. CNS structures occupy approximately 55 acres of the total site area. NPPD leases 715 acres in Nebraska and 234 acres in Missouri for agricultural activities such as farming and livestock. The 55 acres of facility structures include a control/reactor/turbine complex serving a General Electric boiling water reactor with a generating capacity of 830 megawatts electric, a low-level radwaste building, off-gas filter building, elevated release point, diesel generator building, miscellaneous circulating water system structures, independent spent fuel storage installation (ISFSI), switchyard and other infrastructure. The facility uses the Missouri River for cooling water in a single-pass cooling water system. CNS utilizes two wells for potable water supply and three additional wells for service purposes. Wells are finished in alluvial aquifer which is under immediate influence of the Missouri River. CNS monitors groundwater through sampling of 14 monitoring wells. CNS does not routinely monitor surface water. CNS discharges process water to the Missouri River through a discharge canal. It is our understanding that the licensee

does not intend to undertake any facility refurbishment activities as part of its license renewal although NPPD is constructing an ISFSI to serve CNS through the renewal term.

Based on our overall review and the level of our comments, EPA has rated the draft Supplemental Environmental Impact Statement (SEIS) for this project EC-2 (Environmental Concerns-Insufficient Information). EPA's detailed comments on aspects of the draft SEIS and a copy of EPA's rating descriptions are provided as enclosures to this letter. This EC-2 rating is based on the uncertainty of potential impacts to ground and surface waters from radiological contamination, the effects of future changes to the river environment on CNS operation and the evaluation of alternatives to CNS license renewal. Specific to the draft SEIS, the curtailed presentation of radiological data limits the ability of the reader to ascertain its strength. In addition, the presentation of values regarding many parameters lacks any benchmark against which the reader could determine significance or trend information which would allow the reader to understand whether emissions were steady, increasing or decreasing over 36 years of operation. Further, conclusions reached in the GEIS which affect alternative assessment and selection in the SEIS should be brought forward in some more appropriate form in the SEIS.

As reflected in our enclosed issue-specific comments, we request that the NRC include, as part of its license renewal for CNS, a requirement to collect data on the aquatic community of the Missouri River in the vicinity of CNS which would provide contemporary ecological information of the area of the river receiving immediate impact from facility operation, particularly cooling water withdrawals. As stated in our comments during the scoping process and referenced in the draft SEIS, currently available data regarding the immediate aquatic environment of CNS is over 30 years old. With continued operation of CNS to 2034, the conclusions reached by the licensee in its Environmental Report and the NRC in its SEIS regarding "any new and significant information on environmental issues," in the context of the GEIS and 40 CFR 51, Subpart A, Appendix B, treatment of Category 1 issues, relying solely on data collected during initial licensing will become unsupportable. The draft SEIS recognizes the dynamic, unstable nature of the lower Missouri River. As the federal government continues to expend significant resources on the recovery of species and restoration of historic river structure and function, the need for current data on the river in the vicinity of CNS and on possible impacts related to continued CNS operation and its final disposition is critical to the comprehensive review required by NEPA.

We appreciate the opportunity to provide comments regarding this project. If you have any questions or concerns regarding this letter, please contact Mr. Joe Cothern, NEPA Team Leader, at (913) 551-7148, cothern.joe@epa.gov, or Larry Shepard, at (913) 551-7441, shepard.larry@epa.gov.

Sincerely yours,

Ronald Hammerschmidt, Ph.D.
Director
Environmental Services Division

Enclosures

cc: John Bender, NDEQ
June M. DeWeese, USFWS
Gene Zuerlein, NGPC
Julia Schmitt, NDHHS

Issue-specific Comments

Purpose and Need

We recognize that the draft SEIS relies upon the GEIS for its project purpose and need statement and that this statement is generic to all NRC license renewal decisions. However, we believe it is important to comment on this feature of the draft SEIS as it appears to influence the thoroughness of the document's evaluation of alternatives. Both the GEIS and the draft SEIS appear to confuse project 'purpose and need' with the proposed action itself (i.e., issuance of a renewed license) and, thereby, hinders the full consideration of all reasonable alternatives in this draft SEIS. In a NEPA context, the project purpose and need is to "provide an option that allows for power generation capability beyond the term of a current nuclear power plant operating license to meet future system generating needs, which may be determined by State, utility, and, where authorized, Federal decision-makers" (Section 1.2, Chapter 1). The expiration of the CNS' current operating license and existing and future energy demands in the region is the 'need' to which NRC is "responding [to] in proposing the alternatives including the proposed action" (40 CFR 1502.13). The NRC's proposed action is "issuing a renewed license for Cooper Nuclear Station, Unit 1"; however, this is but one alternative to addressing this 'need.' A fuller statement of project purpose and need is, in our estimation, an important distinction to providing a full, open review of all possible alternatives to meeting project purpose and need. This approach to purpose and need fully implements CEQ requirements regarding NRC's responsibility to "rigorously explore and objectively evaluate all reasonable alternatives", "devote substantial treatment to each alternative considered in detail", "include reasonable alternatives not within the jurisdiction of the lead agency" and "include the alternative of no action" (40 CFR 1502.14(a), (b), (c) and (d)).

The intent of 40 CFR 1502.14 is difficult to achieve when project purpose and need is so directly linked to the singular decision whether to reissue an operating license. Any alternative which does not meet project purpose and need does not appear to be a reasonable or viable alternative by any measure. Inclusion of a 'no action' alternative within the SEIS is required under CEQ regulations at 40 CFR 1502.14(d). The draft SEIS states that the 'no action' alternative does not meet the project's purpose and need (Section 8.5). Further, if purpose and need are tied to the proposed action, none of the alternatives to license renewal will meet project purpose and need and this contradiction appears to affect the rigor of the evaluation of these alternatives later in the draft SEIS (40 CFR 1502.14(a) and (b)). The draft SEIS links, throughout the document, the broad project purpose and need to the NRC's determination whether safety issues or environmental impacts should preclude license renewal. In simple summation, the NRC will renew the current license, unless its' analysis reveals significant safety or environmental issues that would preclude it. That appears to create the impression that the licensing decision is the project purpose. It would seem that the project purpose and need statement should not preclude selection of any of the alternatives, including the 'no action' alternative, regardless of the outcome of the NRC evaluation of the licensee's application for renewal. Regardless of the outcome of NRC's license renewal decision, the EIS process should inform and support deliberations by other decision-makers (e.g., "State regulators and utility officials," page xviii, Executive Summary) on how to meet this energy demand by any means, including continuing

operation of CNS-1, new generation sources (e.g., supercritical coal-fired, natural gas-fired, a combination), existing sources operating outside this region, conservation measures responding to reduced capacity or a combination of these alternatives. In essence, selection of an alternative other than license renewal as the preferred alternative is not precluded by NRC's regulatory responsibilities and is fully consistent with 40 CFR 1502.14(c) which provides for the inclusion of "reasonable alternatives not within the jurisdiction of the lead agency." The SEIS should clarify whether the purpose of the project is to meet the energy demands of the region currently met by CNS operation or only a license renewal decision.

Affected Environment and Environmental Impacts of Operation

Radiological Environmental Monitoring Program (REMP) Data

The draft SEIS characterizes its conclusions regarding radiation exposures to humans and contamination of the environment from radiation releases on a limited amount of REMP data (e.g., 2003 through 2007) without explanation. Section 2.1.2 characterizes multiple forms of radioactive waste streams from CNS using data from 2003 through 2007 or only data from 2007. In Section 4.8.1., the draft SEIS generally summarizes "the calculated hypothetical maximum dose to an individual located at the CNS-1 site boundary from radioactive liquid and gaseous effluents released during 2007." The draft SEIS offers no explanation why that single year of data was relied upon to make the assessment. Similarly, in Section 4.9.7.4, the draft SEIS qualitatively summarizes REMP environmental data for only 2007 for several media to assess exposures from subsistence consumption of fish and wildlife. Again, there is no explanation offered for why only one year of data is utilized in making these determinations nor does the draft SEIS present a quantitative summary of available data. The SEIS should provide a rationale for relying on this more limited data set after almost 40 years of operation. Regarding both the assessment of radiation exposures to humans and contamination of ground and surface water, the SEIS should characterize REMP data rather than merely reference a data set and the NRC's judgment of their significance (i.e., "reasonable", "no unusual trends"). Recognizing that CNS' REMP has a 'indicator-control' design, a presentation of trend and comparison to control or environmental benchmark, where available, utilizing a more robust data set than just one or several years would provide support to the NRC's determinations of significance in the SEIS. The SEIS would be improved if the document provided some information on 'control' location and the basis for determining these sites were beyond the influence of CNS emissions and discharges. Public review of radiological data within the SEIS would also be strengthened with a more complete and thorough organization of that data for each waste stream, including non-contact cooling water (Outfall 001). Currently, the draft SEIS relies completely on the NRC's qualitative expressions that there are "no unusual trends", "no measurable impact" and "small significance" without the benefit of presenting any characterization of the data supporting these conclusions, their completeness and their representativeness of the larger operational data set.

Ground Water

The SEIS does not address the potential for radiological contamination of alluvial groundwater and, therefore, the Missouri River from atmospheric washout in the immediate area of CNS. There is no description of background or historic groundwater contamination or trends in

groundwater radiological contamination during the current license period as would be expected from the facility's REMP which was initiated in 1971. In Section 2.1.7.1, the SEIS makes statements regarding a large number of monitoring wells installed to "measure the concentration of tritium in ground water" and documented "instances of liquid radiological releases." The SEIS also states that "none of the releases is a current source of ground water contamination", but provides no basis for this statement. The document also indicates that sampling and analysis results from the ground water monitoring program will be included in the final SEIS. The absence of this information in the draft SEIS interferes with our ability to evaluate radiological impacts to ground water and, potentially, the Missouri River. The SEIS would be improved if it included: the rationale behind the installation of the monitoring wells on-site and their locations, particularly the 11 installed to measure tritium contamination, the rationale behind the 3 remaining wells installed as part of CNS' INFSI Project, comparisons of the radiological character of site ground water in comparison with off-site reference or background, an explanation of benchmarks for both human health and aquatic life exposures and a characterization of ground water trends with regard to radiological contamination. Further, the SEIS should specify possible sources of radiological contamination and response actions by the licensee based on the presence of radiological contamination in these wells. Public review of these data would be strengthened if there was more information regarding what radiological levels are 'expected' by NRC at this facility, what levels might raise concern for the NRC and what measures CNS intends to take or has taken to address sources of contamination to ground water.

Surface Water

Section 4.4 of the draft SEIS does not adequately characterize CNS' use of surface water in comparison to available river flows. The SEIS would be improved if it characterized the percentage of flow utilized by CNS under low and high flow river conditions under 'wet' and drought periods in the basin. Given the direct hydrologic link between ground water and the river, computations of relative facility water consumption should combine ground water and surface water withdrawals. An assessment of comparative volumes of river flow use by CNS during varying conditions (e.g., seasonal, climatic) would better characterize both the potential impact of operation on the river and the facility's dependence upon river flow. Section 2.1.6 mentions that "the circulating water system flow would be about 47 percent of Missouri River flow" under critical low flow conditions. The fact sheet supporting the State of Nebraska's NPDES permit for CNS states that 625 MGD is withdrawn from the river at the intakes. The Missouri River basin appears to be ending a recent long-term drought period during which the navigation season was shortened several times. In the recent past, low winter flows and continuing river bed degradation in some reaches have caused utilities drawing water from the lower river to take extreme engineering measures to ensure a continuing flow of water to their systems. Congress has recently ordered the Army Corps of Engineers to study those purposes for which the current Missouri River system is operated as well as to develop a formal plan to recover native species and the river ecosystem. It is reasonable to consider these actions as they might affect CNS operation during a license renewal period which extends to 2034. In addition, climatic changes to the region could result in changes in the availability and timing of river flows for facility operation. Treatment of these complex relationships in Section 4.4 is not robust enough to aid in the decision-making value of the SEIS.

Given the potential impacts of thermal discharges from any single-pass cooling system, Section 4.5.3 should provide much more information regarding CNS's NPDES compliance record since 1974 with regard to its temperature limits, recent warming trends in ambient river water and tributary flows and the impact of warmer receiving water on facility temperature compliance and a characterization of the relative volume of cooling water discharge to river flow at high and low river flows. Assimilation of heat by receiving waters without adverse effect to aquatic organisms has been a significant issue for any energy production facility and is becoming more problematic for some facilities with recent trends of increasingly warmer receiving waters (i.e., less assimilative capacity for heat). This issue warrants more detailed treatment in the SEIS. NRC should consider adding more detailed information regarding the facility's temperature allocation, modeling and mixing zone calculations as an appendix to the document.

Section 2.1.7.2 states that CNS operations do not affect water quality in the Missouri River based on a cursory description of data from the Army Corps of Engineers' Water Control Manual and listings of impairment by the State of Nebraska. There is no characterization of available monitoring data for the Missouri River in the vicinity of CNS. The draft SEIS states that NPPD does not monitor surface waters as part of its environmental program. In fact, there is limited ambient water quality data for the Missouri River. The SEIS should avoid making statements regarding the impacts of facility operation on the river based on limited and uncharacterized data. Finally, the State of Nebraska has designated the river for more beneficial uses than is stated in this section.

Section 2.1.7.3 is incomplete as it does not discuss the two compliance schedules contained within CNS' NPDES permit for its cooling water intake structure (Clean Water Act, Section 316(b)) and water quality-based limits for total residual chlorine. The SEIS should also clarify which outfalls discharge to surface water and which outfalls are chlorinated or brominated.

Aquatic Life

Although we continue to have concerns about the age of the data relied upon to characterize the impacts of entrainment and impingement on river biota (Section 4.5.2.3, page 4-6), we generally agree with the conclusions of the analysis preformed by NRC staff in this section. However, Section 4.5.2 would be greatly improved if the analysis included impingement data from other facilities utilizing the same or other technology and source water (i.e., large river) against which to compare CNS data. It is difficult to determine if the amount of fish impinged at CNS constitutes a comparatively large or small amount of biomass. Alternatively, data regarding entrainment at CNS appears to be very limited and inconclusive making the conclusions expressed in Section 4.5.2 regarding entrainment much more speculative and qualitative. As addressed in the cover letter to these comments, the basis for asserting that CNS operation has a small impact on aquatic life in the Missouri River would be better supported if NPPD provided more contemporary data regarding river biota in the immediate environment of the facility in an indicator-control design similar to the REMP and better characterized risks to biota from entrainment.

As with our previous comments regarding the presentation of REMP data, the draft SEIS limits its characterization of radiological contamination in the environment, in many instances, to one

year's worth of data. The document briefly mentions, in Section 4.9.7.4, monitoring milk, vegetation, surface water, drinking water, groundwater, fish and sediment, but characterizes data from only 2007. Relying on conclusions of significance apparently drawn from one year provides little basis for the NRC concluding that "the routine operation at CNS-1 has had no significant or measurable radiological impact on the environment." The SEIS reader has only the assurances of NRC staff that these data are representative of ambient conditions to conclude that a proper evaluation of environmental impact has indeed occurred.

Stormwater and Wastewater Treatment

The draft SEIS does not address possible tritium contamination within the wastewater collection and treatment system. Downwash from facility venting operations and worker sanitary contributions are common sources of radiological contamination of nuclear facility liquid effluent. CNS discharges collected site stormwater into ground water through drainage wells. The draft SEIS does not characterize stormwater radiological contamination which reflects downwash from site structures. The SEIS should summarize REMP data and characterize radiological contamination resulting from air deposition and resulting surface runoff which is discharged into drainage wells. Similarly, sanitary wastewater effluent is land-applied on-site, but there is no characterization of possible radiological ground water contamination associated with this waste stream.

There is no discussion within the draft SEIS regarding potential wastewater lagoon sludge contamination with radionuclides or the means by which the sludge is disposed. The SEIS should characterize this environmental medium and also describe how and where the sludge is disposed.

Spent Fuel Storage and Independent Spent Fuel Storage Installation

Although collective offsite radiological impacts of spent fuel storage are addressed under other NEPA documentation, the SEIS should describe the current status of the CNS's new Independent Spent Fuel Storage Installation (ISFSI) and projected capacity over the term of the license renewal period that extends to 2034. This information does not pertain to radiological risk assessment and would not be adequately addressed in the 1996 GEIS and Addendum. Given the current status of the Department of Energy's application for license for the Yucca Mountain site, this information is germane to a discussion of short-term use and long-term productivity and an irreversible commitment of resources (40 CFR 1502.15). The need for continued storage, on-site, of spent fuel might extend well beyond the operating life of the facility itself. The status of each licensed facility with regard to storage of spent fuel varies and each SEIS should characterize that status and project change to that status over the lifetime of the renewed license.

Environmental Justice

The SEIS should describe socioeconomic factors associated with CNS affecting the Sac and Fox and Iowa Reservation populations which are within the facility's ROI. These factors are noticeably absent from the SEIS' assessment of community-based impacts.

The discussion of risks from subsistence consumption of fish and wildlife in Section 4.9.7.4 relies on data from 2007 and concludes that risk is minimal without the benefit of any summary data from the facility's REMP. With regard to multiple pathways of exposure, the draft SEIS concludes that "the routine operation at CNS-1 has had no significant or measurable radiological impact on the environment (page 4-33)." Given that the REMP began in 1971, it is unclear why this analysis is performed on a single year's worth of REMP data. This statement would be better supported with the characterization of more REMP data than from only 2007.

Environmental Impact of Alternatives

The SEIS carries forward, for detailed evaluation, in addition to the proposed action, three alternatives and the 'no action' alternative, although the SEIS states that the 'no action' alternative does not meet project purpose and need. Fifteen other alternatives were considered, but dismissed before detailed evaluation. The three alternatives evaluated are: supercritical coal-fired generation; natural gas combined-cycle generation; and a combination of natural gas combined-cycle generation, conservation capacity increases and wind power.

Super Critical Coal-Fired Generation

The cumulative air impacts of emissions associated with this alternative in combination with those of existing coal-burning facilities in eastern Nebraska, western Iowa and northwestern Missouri should be considered in Section 8.1. The significance of the impacts of this alternative on air quality and total regional carbon emissions should be evaluated in the context of all other carbon sources.

Mercury is a significant contaminant of concern associated with coal combustion. Many watersheds downwind of the CNS site have been listed by Iowa and Missouri for mercury contamination. Further, mercury contamination is measured in fish tissue in areas far from their estimated source, primarily from air deposition. Section 8.1 does not provide an assessment of impacts from hazardous air pollutants, specific to this alternative, particularly with regard to mercury emissions. For this alternative, more information is needed in the SEIS regarding projected mercury emissions and the status of surface waters in the depositional path with regard to mercury.

Evaluation of Alternatives

Given the comparatively cursory evaluation of the three alternatives compared to the preferred action, it is not clear how the Alternatives Summary could conclude that "All other alternatives capable of meeting the needs currently served by CNS-1 entail potentially greater impacts than the proposed action of license renewal of CNS-1." This conclusion is not sufficiently supported by the alternatives analysis, consistent with the requirements of 40 CFR 1502.14(a). Notwithstanding the requirements for "rigorous" and "objective" alternatives analysis at 40 CFR 150.14(a), the NRC's expressed view of its responsibilities to determine whether "there are findings in the safety review required by the Atomic Energy Act of 1954 (AEA) or findings in the NEPA environmental analysis that would lead to the rejection of a license application..." (Executive Summary, page xviii) does not appear to necessitate any alternatives analysis.

The summary of impacts contained in Tables 1 and 8-5 does not appear to be a rigorous evaluation of the five alternatives carried forward in the draft SEIS for detailed review as is required in 40 CFR 1502.14(a), (b) and (c). In our view, the power of the evaluation required by NEPA, particularly an evaluation of a reasonable range of alternatives to a proposed action, is in a detailed and well-documented determination of whether it is good public policy to proceed with an action instead of an alternative to the proposed action. The discussion of this evaluation of a range of reasonable alternatives within the Executive Summary and Chapter 9 is not compelling and separation points critical to a decision to select the preferred alternative over an alternative are not evident.

As presently described in the draft SEIS, the impacts of the alternatives are characterized according to rather broad categories, primarily in isolation from each other and the proposed action. Rather than weighing of the impacts of each alternative, none of these alternatives are evaluated in direct comparison to the license renewal of the CNS. In effect, the license renewal of the CNS, or any existing facility, stands separately from all other alternatives and is evaluated on its merit alone. This intent is reflected, initially, in project purpose and need. Additionally, some significant impacts associated with continued operation of any existing facility are not addressed within the SEIS, but are addressed generically in the GEIS or other NEPA documentation, making a complete comparison of several large scale impacts of continued operation to the alternatives impossible. No comprehensive assessment or comparison of the merits of generating power by the existing facility or one of the alternatives is performed in this documentation. Unless the economic costs and environmental impacts of spent fuel transportation and disposal and facility decommissioning are somehow incorporated or summarized in the decision documentation supporting this license renewal decision, an equal comparison of alternatives to license renewal by the reader is not possible. This issue reflects an apparent disconnect between the broad treatment of license renewal for all facilities in the GEIS and facility-specific assessments in the SEIS.

Draft Environmental Impact Statement Rating Definitions

Environmental Impact of the Action

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative. EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.